

ORIGINAL

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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DEC 19 1996  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of

The Development of Operational,  
Technical and Spectrum Requirements  
for Meeting Federal, State, and  
Local Public Safety Agency  
Communications Requirements Through  
The Year 2010.

WT Docket No. 96-86

DOCKET FILE COPY ORIGINAL

To: The Commission

REPLY COMMENTS OF AMERITECH MOBILE SERVICES, INC.

Ameritech Mobile Services, Inc. (Ameritech) hereby submits its reply comments in the above captioned proceeding. As shown below, the Commission should take prompt steps to make adequate spectrum available to public safety entities for both the immediate future and the long term. However, the spectrum shortages faced by public safety cannot be fixed with the "band aid" approach suggested by certain commenters, which approach would involve the disruption of existing common carrier radio operations.

The New York State Police (NYSP) suggests in its October 17, 1996 Comments (at page 2) that "the old mobile radiotelephone service is completely obsolete and, with the introduction of

Cellular, Digital Cellular, Personal Communications Service and Mobile Satellite Services, totally unnecessary." Based on this assumption, NYSP advocates a reallocation of the "VHF and UHF mobile radiotelephone service channels to public safety." *Id.* The Federal Law Enforcement Wireless Users Group (FLEWUG) takes the same position in its comments, at page 18. The Commission is well aware that these channels are now only lightly used for mobile telephone service. However, the conclusion of these commenters that the channels are vacant ignores the reality of Part 22 spectrum use. As pointed out in Ameritech's October 21, 1996 Comments in this proceeding, the Part 22 VHF and UHF channels were reallocated nearly eight years ago for flexible use as paging and control channels. See First Report and Order, Flexible Allocation of Frequencies in the Domestic Public Land Mobile Services for Paging and Other Services, 4 FCC Rcd. 1576 (1989).

At the time this flexible use scheme was adopted, the Commission recognized the dramatic growth in paging operations. *Id.* 4 FCC Rcd. at 1576, para. 8. The Commission also recognized a pressing need for more dedicated control channels with which to operate these paging systems. See Second Report and Order Flexible Allocation of Frequencies in the Domestic Public Land Mobile Services for Paging and Other Services, 4 FCC Rcd: 6415, 6416 (1989) ("Control frequencies are essential for modern paging systems. . . Common carriers have submitted specific information

showing that frequencies required for control of their systems are unavailable in major urban areas"). In the intervening eight years, the demand for paging service has grown geometrically. See, e.g. Notice of Proposed Rulemaking, WT Docket No. 96-18, 11 FCC Rcd. 3108, 3110 para. 6 (1996) (The paging industry grew by approximately 29% in calendar year 1993, and 38% in calendar year 1994, bringing total subscribership to more than 27 million). The need for control channels has grown apace. As a result, the Commission has recognized that the VHF and UHF channels "appear to be more heavily licensed than the 931 MHz [paging] channels." Notice of Proposed Rulemaking, WT Docket No. 96-18, 11 FCC Rcd. 3108, 3112 (1996). Not surprisingly, the Commission's Part 22 database shows that these channels are heavily licensed throughout the State of New York. See Exhibit 1 hereto.<sup>1</sup>

Therefore, the IMTS channels are not available for the short-term "fix" recommended by NYSP and FLEWVG, and their reallocation of these documents would severely disrupt existing paging operations serving hundreds of thousands of public subscribers. In the state of Michigan alone (one of eight states within the company's coverage area), Ameritech is currently serving more than 23,000 subscribers on IMTS channels, including many doctors, ambulance services, sheriff departments, emergency

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<sup>1</sup>Exhibit 1 includes a frequency study for the VHF and UHF Improved Mobile Telephone Service (IMTS) channels within 100 miles of Syracuse, Albany and Rochester. The study shows that, lower-tiered markets, all of the channels are licensed. The study does not include the New York City area, where spectrum is even more scarce.

road services, and other safety and medical service providers. The total number of subscribers served on IMTS channels will only grow, since Ameritech is approaching full loading on its 931 MHz regional paging system.

South Bay Regional Public Communications Authority (South Bay) suggests in its comments (at page 3) that the VHF and UHF channels "are reserved for control use purposes by wide area paging systems, a function for which paging systems now use satellite links." While satellite control is certainly in use by some of the largest paging systems, it is not a feasible means of controlling local or even many regional paging systems, because of the substantial cost associated with satellite links. While many paging systems are "wide-area," a substantial number of systems are not large enough to justify satellite control. Many small businesses compete in the paging industry with local systems. And even large companies such as Ameritech operate local-only paging systems, since many customers do not need regional or nationwide service. Providing local service allows these carriers to make capacity available on their heavily congested regional systems, by segregating customers according to their coverage needs.

Therefore, the need for UHF and VHF channels as control links remains acute. Moreover, South Bay's comments focus on the 470-512 MHz channels allocated under Part 22. The other UHF and

VHF channels allocated under Part 22 are needed not only for control links, but also for paging channels, and as two-way links to rural subscribers.

South Bay stops short of advocating a reallocation of these frequencies, but instead urges a less strict approach to waiver requests seeking use of Part 22 spectrum. Ameritech cannot rule out the possibility that appropriate circumstances could exist which would justify a waiver, where no alternative spectrum was available and the 470-512 MHz channels were truly unused. Therefore, Ameritech expresses no opinion on the individual merits of South Bay's pending waiver request to use 470-512 MHz channels in Southern California. However, the Commission has properly guarded against de facto spectrum reallocations through the waiver process. And it is unlikely that there are instances where public safety channels are exhausted but common carrier channels are widely available. In populated areas where public safety use is high, Part 22 channels are scarce.<sup>2</sup> In rural areas, Part 22 channels are not as congested (although still needed for rural radio operations), but public safety spectrum is likewise less congested.

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<sup>2</sup>Ameritech has exhaustively searched the Commission's licensing records for available paging channels, including VHF and UHF channels, to relieve congestion on its paging operations in the primary markets served by Ameritech, including Chicago, Detroit, St. Louis, Minneapolis, Indianapolis, Milwaukee, Cleveland and Cincinnati. No paging channels were found to be available in any of these markets.

### Conclusion

In light of the foregoing, the Commission should not compound a difficult situation by disrupting valuable common carrier radio services, stranding substantial investment, and thereby harming medical personnel and other public subscribers for the sake of attempting an ineffective "patchwork" approach to public safety spectrum needs. While the Commission was able to establish a mechanism for relocating 2GHz users to alternative spectrum in order to reallocate this spectrum for the Personal Communications Service (PCS), the record in WT Docket No. 96-86 has established that there is no alternative spectrum available for paging. Therefore, the analogy drawn by NYSP 's comments (at page 2) does not apply. Instead, the Commission should address public safety needs through the short term efficiencies to be gained by the implementation of its narrowbanding scheme in PR Docket No. 92-235, and by long term reallocation of government spectrum to the public safety community.

Ameritech agrees that public safety needs should be given the highest priority in assigning the future uses for lightly-used government channels. However, the thriving paging industry

must be allowed to retain the relatively thin slice of spectrum which it has been using efficiently for years.

Respectfully submitted,

**AMERITECH MOBILE SERVICES, INC.**

By

*Dennis L. Myers*  
Dennis L. Myers, Vice  
President and General Counsel

Ameritech Cellular Services  
2000 West Ameritech Drive  
Location 3H78  
Hoffman Estates, IL 60195-5000  
Tel. (847) 765-5715

*John A. Prendergast*  
John A. Prendergast

Blooston, Mordkofsky, Jackson  
& Dickens  
2120 L Street, N.W., Suite 300  
Washington, D.C. 20037  
Tel. (202) 659-0830

Its Counsel

Filed: December 19, 1996

## F R E Q U E N C Y   S E A R C H   R E S U L T S

FCC Staff Study List as of: October 12, 1994

12-17-96 15:15

Search Frequencies: 2-way

Search Area #1: Albany, NY

(Albny)

100 mile radius of 42-39-01 N.Lat 73-45-01 W.Long  
 ( From 41-12-05 71-47-15 To 44-05-57 75-42-47 )

## \*\*\*\*\* Summary of Results \*\*\*\*\*

Frequency	Page No.	Number of Records	Closest Record Albny
152.03		19	0.6
152.06		10	13.4
152.09		20	28.9
152.12		14	3.3
152.15		11	13.4
152.18		15	0.6
152.21		16	0.6
152.51		6	11.0
152.54		3	82.1
152.57		8	11.0
152.60		11	11.2
152.63		4	11.0
152.66		5	39.0
152.69		8	11.0
152.72		2	66.3
152.75		4	28.9
152.78		11	1.3
152.81		3	21.2
454.025		2	12.2
454.050		38	0.2
454.075		16	6.5
454.100		18	3.3
454.125		8	13.4
454.150		18	3.3
454.175		34	33.6
454.200		17	3.0
454.225		8	1.8
454.250		7	13.4
454.275		6	3.0
454.300		6	13.4
454.325		8	21.0
454.350		14	63.0
454.375		9	12.2
454.400		3	13.4
454.425			None



## F R E Q U E N C Y   S E A R C H   R E S U L T S

Page 2

FCC Staff Study List as of: October 12, 1994

12-17-96 15:15

Frequency	Page No.	Number of Records	Closest Record Albny
454.450		63	0.6
454.475		2	13.7
454.500		2	12.2
454.525		4	82.3
454.550		6	0.2
454.575		7	12.2
454.600		5	11.2
454.625		21	3.3
454.650		3	83.6
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Totals		495	0.2

## F R E Q U E N C Y   S E A R C H   R E S U L T S

Page 1

FCC Staff Study List as of: October 12, 1994

12-17-96 15:15

Search Frequencies: 2-way

Search Area #1: Syracuse, NY (Srycs)  
100 mile radius of 43-03-04 N.Lat 76-09-14 W.Long  
( From 41-36-08 74-10-42 To 44-30-00 78-07-46 )

## \*\*\*\*\* Summary of Results \*\*\*\*\*

Frequency	Page No.	Number of Records	Closest Record Srycs
152.03		3	28.3
152.06		11	3.4
152.09		9	0.6
152.12		9	0.6
152.15		5	1.1
152.18		10	0.6
152.21		12	37.0
152.51		4	48.5
152.54		9	34.3
152.57		10	6.0
152.60		5	30.7
152.63		16	0.7
152.66		5	6.3
152.69		3	6.0
152.72		6	24.4
152.75		4	48.5
152.78		5	0.2
152.81		3	6.0
454.025		2	0.6
454.050		4	0.6
454.075		4	0.6
454.100		8	34.3
454.125		6	49.8
454.150		1	49.9
454.175		2	5.8
454.200		7	3.4
454.225		2	3.2
454.250		1	3.4
454.275		1	74.0
454.300		1	38.1
454.325		22	0.6
454.350		27	0.6
454.375		8	6.3
454.400		2	6.3
454.425		1	5.8

## F R E Q U E N C Y   S E A R C H   R E S U L T S

Page 2

FCC Staff Study List as of: October 12, 1994

12-17-96 15:15

Frequency	Page No.	Number of Records	Closest Record Srycs
454.450		42	0.6
454.475		1	0.6
454.500		2	5.8
454.525		1	5.8
454.550		20	0.6
454.575		5	6.1
454.600		3	6.3
454.625		1	50.2
454.650		5	3.0
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Totals		308	0.2

## F R E Q U E N C Y   S E A R C H   R E S U L T S

Page 1

FCC Staff Study List as of: October 12, 1994

12-17-96 15:15

Search Frequencies: 2-way

Search Area #1: Rochester, NY (Rchtr)  
100 mile radius of 43-09-41 N.Lat 77-36-21 W.Long  
( From 41-42-45 75-37-36 To 44-36-37 79-35-06 )

## \*\*\*\*\* Summary of Results \*\*\*\*\*

Frequency	Page No.	Number of Records	Closest Record Rchtr
152.03		2	26.7
152.06		15	19.3
152.09		3	0.4
152.12		6	44.8
152.15		3	74.7
152.18		7	56.4
152.21		15	0.9
152.51		2	67.4
152.54		6	0.6
152.57		5	27.6
152.60		4	0.6
152.63		16	27.6
152.66		2	1.6
152.69		4	67.2
152.72		5	0.6
152.75		3	0.6
152.78		3	0.6
152.81		4	0.6
454.025		2	67.5
454.050		8	0.5
454.075		4	0.4
454.100		6	0.4
454.125		4	0.5
454.150		8	38.7
454.175		3	0.4
454.200		7	0.4
454.225		2	67.5
454.250		2	66.9
454.275		3	0.4
454.300		1	67.5
454.325		29	0.5
454.350		29	0.5
454.375		5	67.5
454.400		2	67.5
454.425		1	72.5

## F R E Q U E N C Y   S E A R C H   R E S U L T S

Page

FCC Staff Study List as of: October 12, 1994

12-17-96 15:1

Frequency	Page No.	Number of Records	Closest Record Rchtr
454.450		44	0.5
454.475		1	74.4
454.500		2	67.5
454.525		1	72.5
454.550		28	0.5
454.575		2	66.3
454.600		3	53.9
454.625		2	38.3
454.650		5	25.1
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Totals		309	0.4

Roger R. Bisby  
Maxon America, Inc.  
10828 N.W. Air World Drive  
Kansas City, Missouri 64153

#### SERVICE LIST

Robert S. Foosaner  
Nextel Communications, Inc.  
800 Connecticut Avenue, N.W.  
Suite 1001  
Washington, D.C. 20006

Lawrence R. Krevor  
Nextel Communications, Inc.  
800 Connecticut Avenue, N.W.  
Suite 1001  
Washington, D.C. 20006

Laura L. Holloway, Esq.  
Nextel Communications, Inc.  
800 Connecticut Avenue, N.W.  
Suite 1001  
Washington, D.C. 20006

Craig M. Jorgensen  
APCO Project 25  
1398 Michigan Avenue  
Salt Lake City, Utah 84105

Ronald K. Greenhalgh  
National Rural Electric  
Cooperative Association  
4301 Wilson Boulevard  
Arlington, Virginia 22203-1860

Judith F. Furie  
Quantum Radionics Corporation  
2121 Eisenhower Avenue  
Alexandria, Virginia 22134

Dr. Gregory M. Stone  
Quantum Radionics Corporation  
2121 Eisenhower Avenue  
Alexandria, Virginia 22314

Colonel Hanford C. Thomas  
New York State Police  
1220 Washington Avenue  
Building 22  
Albany, New York 12226-2252

Jeffrey L. Sheldon, Esq.  
UTC, The Telecommunications Assoc.  
1140 Connecticut Avenue, N.W.  
Suite 1140  
Washington, D.C. 20036

Dr. Lars-Goran Larsson  
Ericsson Inc.  
1634 I Street, N.W.  
Suite 600  
Washington, D.C. 20006-4083

John S. Powell  
P. O. Box 4342  
Berkeley, California 94704-0342

Kenneth R. Yarbrough  
City of Richardson  
Police Department  
P. O. Box 831078  
Richardson, Texas 75083-1078

Ramsey L. Woodworth, Esq.  
Wilkes, Artis, Hedrick & Lane  
1666 K Street, N.W., Suite 1100  
Washington, D.C. 20006

Harold C. Brown, Jr.  
The Board of Supervisors of Marin County  
3501 Civic Center Drive  
Suite 315  
San Rafael, California 94903-7331

Carolyn G. Morris  
U.S. Department of Justice  
Federal Bureau of Investigation  
Washington, D.C. 20535

Donald W. Pfohl  
City of Mesa Arizona  
Communications Division  
161 E. Sixth Place  
Mesa, Arizona 85201

Samuel F. Gargaro  
Minnesota Department of Transportation  
161 St. Anthony, Suite 900  
St. Paul, Minnesota 55103

Robert B. Kelly, Esq.  
Kelly & Povich, P.C.  
1101 30th Street, N.W.  
Suite 300  
Washington, D.C. 20007

Douglas L. Povich, Esq.  
Kelly & Povich, P.C.  
1101 30th Street, N.W.  
Suite 300  
Washington, D.C. 20007

Dr. Michael C. Trahos  
Region-20 Public Safety  
Review Committee  
4600 King Street, Suite 4E  
Alexandria, Virginia 22301-1213

Paul Samuel Smith, Esq.  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Rosalind A. Knapp, Esq.  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Jeffrey H. Olson, Esq.  
Paul, Weiss, Rifkind, Wharton & Garrison  
1615 L Street, N.W., Suite 1300  
Washington, D.C. 20036

Diane C. Gaylor, Esq.  
Paul, Weiss, Rifkind, Wharton & Garrison  
1615 L Street, N.W., Suite 1300  
Washington, D.C. 20036

Pete Wanzenried  
State of California  
Telecommunications Division  
601 Sequoia Pacific Boulevard  
Sacramento, California 95814-0282

Sudhir K. Khanna, P.E., President  
Association of Federal  
Communications Consulting Engineers  
P. O. Box 19333  
20th Street Station  
Washington, D.C. 20036-0333

Chairman Reed E. Hundt  
Federal Communications Commission  
1919 M Street, N. W. -- Room 814  
Washington, D.C. 20054

Kathryn Hosford  
Wireless Telecommunications Bureau  
Federal Communication Commission  
2025 M Street, N.W. Room 8002-D  
Washington, D. C. 20554

Commission James H. Quello  
Federal Communications Commission  
1919 M Street, N. W. -- Room 802  
Washington, D. C. 20554

Herb Zeiler  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N. W., Room 5322  
Washington, D. C. 20554

Commissioner Rachelle B. Chong  
Federal Communications Commission  
1919 M Street, N. W. -- Room 844  
Washington, D. C. 20554

Ira Keltz  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N. W., Room 8010-D  
Washington, D. C. 20554

Commission Susan Ness  
Federal Communications Commission  
1919 M Street, N. W. -- Room 832  
Washington, D. C. 20554

Dr. Thomas P. Stanley  
Chief Engineer  
Federal Communications Commission  
2020 M Street, N. W. -- Room 7130 K  
Washington, D. C. 20554

Michele Farquhar, Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N. W. - Room 5002  
Washington, D. C. 20554

Rosalind K. Allen  
Deputy Bureau Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N. W., Room 7002  
Washington, D. C. 20554

Mark Rubin  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N. W. - Room 8002-B  
Washington, D. C. 20554

Gerald Vaughan  
Deputy Bureau Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N. W., Room 5002  
Washington, D. C. 20554

David Wye  
Wireless Telecommunications Bureau  
Federal Communications Commission  
2025 M Street, N. W. - Room 5002  
Washington, D. C. 20554

Leo R. Fitzsimon, Esq.  
Verner, Liipert, Bernhard,  
McPherson & Hand, Chartered  
901 15th Street, N.W., Suite 700  
Washington, D.C. 20005

Wayne V. Black, Esq.  
Keller and Heckman LLP  
1001 G Street, N.W.  
Suite 500 West  
Washington, D.C. 20001

John Reardon, Esq.  
Keller and Heckman LLP  
1001 G Street, N.W.  
Suite 500 West  
Washington, D.C. 20001

Paula Deza, Esq.  
Keller and Heckman LLP  
1001 G Street, N.W.  
Suite 500 West  
Washington, D.C. 20001

Cheryl A. Tritt, Esq.  
Morrison & Foerster, LLP  
2000 Pennsylvania Avenue, N.W.  
Suite 5500  
Washington, D.C. 20006

Stephen J. Kim, Esq.  
Morrison & Foerster, LLP  
2000 Pennsylvania Avenue, N.W.  
Suite 5500  
Washington, D.C. 20006

Nancy J. Thompson, Esq.  
Comsat Corporation  
6560 Rock Spring Drive  
Bethesda, Maryland 20817

Antoinette Cook-Bush, Esq.  
Skadden Arps Slate Meager  
& Flom  
1440 New York Avenue, N.W.  
Washington, D.C. 20005

Philip V. Permut, Esq.  
Kelley Drye & Warren, LLP  
1200 19th Street, N.W.  
Suite 500  
Washington, D.C. 20036

Edward A. Yorkgitis, Jr., Esq.  
Kelley Drye & Warren, LLP  
1200 19th Street, N.W.  
Suite 500  
Washington, D.C. 20036

Lon C. Levin  
Personal Communications  
Satellite Corporation  
10802 Parkridge Boulevard  
Reston, Virginia 22091

Gary M. Epstein, Esq.  
Latham & Watkins  
1001 Pennsylvania Avenue, N.W.  
Suite 1300  
Washington, D.C. 20024

John P. Janka, Esq.  
Latham & Watkins  
1001 Pennsylvania Avenue, N.W.  
Suite 1300  
Washington, D.C. 20024

Michael Wroblewski, Esq.  
Latham & Watkins  
1001 Pennsylvania Avenue, N.W.  
Suite 1300  
Washington, D.C. 20024  
Attorney for Hughes Space &  
Communications International

Mark E. Crosby  
Industrial Telecommunications  
Association, Inc.  
1110 N. Glebe Road, Suite 500  
Arlington, Virginia 22201-5720

Frederick J. Day, Esq.  
Industrial Telecommunications  
Association, Inc.  
1110 N. Glebe Road, Suite 500  
Arlington, Virginia 22201-5720

Lon C. Levin  
AMSC Subsidiary Corporation  
10802 Parkridge Boulevard  
Reston, Virginia 22091

M.E. Gilbert  
Gilbert & Associates  
P. O. Box 7332  
Arlington, Virginia 22207

Bruce D. Jacobs, Esq.  
Fisher Wayland Cooper,  
Leader & Zaragoza, LLP  
2001 Pennsylvania Avenue, N.W.  
Suite 400  
Washington, D.C. 20006

Jim Gay  
NASTD  
c/o The Council of State  
Governments  
Iron Works Pike  
P. O. Box 11910  
Lexington, Kentucky 40578-1910

William Malone, Esq.  
Miller, Canfield, Paddock  
and Stone  
1225 Nineteenth Street, N.W., Suite 400  
Washington, D.C. 20036-2420

Harold L. Hadland, Esq.  
Nebraska Public Power District  
P. O. Box 499  
Columbus, Nebraska 68601

Richard Barth  
Motorola, Inc.  
1350 Eye Street, N.W.  
Suite 400  
Washington, D.C. 20005

R. Michael Senkowski, Esq.  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006  
Attorney for Motorola, Inc.

Eric W. DeSilva, Esq.  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006  
Attorney for Motorola, Inc.

Karen A. Kincaid, Esq.  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

John L. Bartlett, Esq.  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

Martin W. Bercovici, Esq.  
Keller and Heckman LLP  
1001 G Street, N.W.  
Suite 500 West  
Washington, D.C. 20001

Nicole B. Donath, Esq.  
Keller and Heckman LLP  
1001 G Street, N.W.  
Suite 500 West  
Washington, D.C. 20001

Dan Bart  
Personal Communications Division  
2500 Wilson Boulevard, Suite 300  
Arlington, Virginia 22201

Eric Schimmel  
Personal Communications Division  
2500 Wilson Boulevard, Suite 300  
Arlington, Virginia 22201

Jesse Russell  
Personal Communications Division  
2500 Wilson Boulevard, Suite 300  
Arlington, Virginia 22201



David G. Walchak  
International Association of  
Chiefs of Police  
515 North Washington Street  
Alexandria, Virginia 22314-2357

Robert Rose  
Northern California Chapter  
of the Association of Public  
Safety Communications Officials  
7468 Muirwood Court  
Pleasanton, California 94588-4232

David J. Hensing  
American Association of State  
Highway and Transportation Officials  
444 N. Capitol Street, N.W., Suite 24  
Washington, D.C. 20001

Gary David Gray  
County of Orange  
Communications Division  
840 North Eckhoff Street  
Suite 104  
Orange, California 92868-1021

Richard Ekstrand  
The Rural Cellular Association  
2120 L Street, N.W., Suite 520  
Washington, D.C. 20554

Scott Carlson, Esq.  
City of Dallas  
City Hall  
Dallas, Texas 75201

Dale W. Kirmer  
State of Kansas  
Division of Emergency Management  
2800 S.W. Topeka Boulevard  
Topeka, Kansas 66611-1287

Raymond R. Smith  
Ohio Department of  
Administrative Services  
Division of Computer Services  
30 East Broad Street  
Columbus, Ohio 43266-0409

Peter Vaky, Esq.  
The City of Fort Worth  
1000 Throckmorton  
Fort Worth, Texas 76102

Bob Terrell  
The City of Fort Worth  
1000 Throckmorton  
Fort Worth, Texas 76102

Peter Ungar  
The City of Fort Worth  
1000 Throckmorton  
Fort Worth, Texas 76102

Frank Shafroth  
National League of Cities  
1301 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

Kimyetta Robinson  
National League of Cities  
1301 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

Richard J. Shulak  
Wisconsin State Patrol  
Bureau of Communications  
P. O. Box 7912  
Madison, Wisconsin 53707-7912

Dwight Purtle  
Johnson County Kansas  
Emergency Communications Center  
6000 Lamar  
Mission, Kansas 66202

Jonathan P. Bigony  
The Prince George's County Government  
Central Communications Facility  
7911 Anchor Street  
Landover, Maryland 20785

Alan Dixon  
10138 Fontaine Drive  
Baltimore, Maryland 21234-1204

Michael F. Altschul, Esq.  
Cellular Telecommunications  
Industry Association  
1250 Connecticut Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

Randall S. Colman, Esq.  
Cellular Telecommunications  
Industry Association  
1250 Connecticut Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

Andrea D. Williams, Esq.  
Cellular Telecommunications  
Industry Association  
1250 Connecticut Avenue, N.W.  
Suite 200  
Washington, D.C. 20036

John F. Beasley, Esq.  
BellSouth Corporation  
1155 Peachtree Street, N.E.  
Suite 1800  
Atlanta, Georgia 30309-2641

William B. Barfield, Esq.  
BellSouth Corporation  
1155 Peachtree Street, N.E.  
Suite 1800  
Atlanta, Georgia 30309-2641

Jim O. Llewellyn, Esq.  
BellSouth Corporation  
1155 Peachtree Street, N.E.  
Suite 1800  
Atlanta, Georgia 30309-2641

David G. Frolio, Esq.  
BellSouth Cellular Corp.  
1133 21st Street, N.W.  
Washington, D.C. 20036

David G. Richards, Esq.  
BellSouth Cellular Corp.  
1133 21st Street, N.W.  
Washington, D.C. 20036

Troutman Sanders  
600 Peachtree Street, N. E.  
Suite 5200  
Atlanta, GA 30308-2216

International Transcription Service  
Federal Communications Commission  
2100 M Street, N. W., Room 140  
Washington, D. C. 20554

Robert M. Gurss  
Wilkes, Artis, Hederick & Lane,  
Chartered  
1666 K Street, N. W., Suite #1100  
Washington, D. C. 20006

Paul R. Schwedler  
Deputy Chief Regulatory Counsel  
National Communications System  
Defense Information Systems Agency  
701 S. Courthouse Road  
Arlington, VA 22204

Ms. Louis L.M. Tucker  
Bell Communications Research, Inc.  
2101 L Street, N. W., Suite #600  
Washington, D. C. 20037

Paul C. Besozzi, Esquire  
Patton Boggs, L.L.P.  
2550 M Street, N. W.  
4th Floor  
Washington, D. C. 20037

Glen A. Glass, Esq.  
Southwestern Bell Mobile Systems  
1733 Preston Road  
Suite 100-A  
Dallas, TX 75752

Mr. John T. Scott III  
Crowell & Morning  
Suite 1000  
1001 Pennsylvania Ave., N. W.  
Washington, D. C. 20554

Richard A. Muscat,  
Assistant Attorney General  
Consumer Protection Division  
Public Agency Representation Section  
P.O. Box 12548, Capital Station  
Austin, TX 78711-2548

Jeffrey L. Sheldon  
UTC  
1140 Connecticut Ave., N. W.  
Suite 1140  
Washington, D. C. 20036

Florence Dean, Special Counsel  
New York City Transit Authority  
Office of the General Counsel  
130 Livingston Street, 12th Floor  
Brooklyn, NY 11201

Travis A. Williams, Chair  
CPRA Regulatory Committee  
Post Office Box 2231  
Downey, CA 90242

Lawrence D. Hughes  
Acting County Executive  
County of Prince William, Virginia  
1 County Complex Court  
Prince William, VA 22192